



To Whom It May Concern:

This letter is written as a comment in response to the Matter of Modernizing the E-Rate Program for Schools and Libraries.

At the School District level, planning for "category two" projects, often consisting of many buildings of varying ages and construction methods, is a difficult task. While funding methods should be established on a per student basis, the funding budget should be based on a district-wide level instead of by building within the district. We often have several buildings with similar student demographics, for instance most districts have multiple elementary schools. These buildings were often built years apart and using different design and construction methodologies. Buildings constructed before the 1970's often have very thick walls, limited space for distribution facilities. Costs for wiring and IDF/MDF infrastructure can be increased substantially in these cases, meeting standards for wireless can require 1 or more access points per classroom. Other newer buildings, because of building methods and codes, have accommodations for the previously mentioned features.

These simple suggestions would allow LEA's to make better use of E-Rate funds by allowing the local planners to spend budget dollars where required to ensure equity for students across the district. When funding is budgeted per student, per building, no consideration is given to existing equipment and infrastructure at each school building or the technology or educational program that already exists.

With the next and any ongoing 5 year programs, consider these funding methods:

1. Budget based on student count for LEA for the 5 year program.
2. Enable the LEA to spend the money within the LEA, not limited to the building. Some technology can be shared infrastructure, serving many locations such as, network access control or controllers required to manage wireless networks.
3. Allow the LEA to prescribe and develop the equity in programming based on local need, subjected to any E-Rate audits.
4. Conditions that are required for compliance with the E-Rate program should be handled via category one funding, for example content filtering, both hardware and subscription services (don't confuse management services with subscription services).

These simple suggestions can improve the planning and implementation process substantially, while providing a better program for the students and staff. Please don't tie budget dollars to specific buildings because the budget does not consider the construction method, age of building or a host of other conditions that may require more out of pocket dollars and therefore limit progress to the stated goals of the program.

Best Regards,

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